

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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CELY CASTILLO,

Case No.: 20-CV-4337

Plaintiff, DECLARATION OF CATHY

DEGEORGIO

-against-

PLAZA MOTORS OF BROOKLYN INC., JOHN
ROSATTI, ADAM ROSATTI, and LUIS SIMEOLI

Defendants.

_____X

Cathy DeGeorgio declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am employed as an Executive Assistant for Plaza Motors of Brooklyn, Inc. ("Plaza"), a defendant in this action.

2. As such, I am familiar with all the facts and circumstances heretofore had herein based upon my personal knowledge.

3. I have reviewed the affidavit of Plaintiff Cely Castillo ("Castillo") dated February 8, 2021 and I submit this declaration to correct false statements stated therein.

4. I held a meeting on August 1, 2019 with Castillo, Soraya Janerpoy ("Janerpoy"), and Vera Nuhi because Janerpoy complained to me that Castillo and her friend, Abina Edwards ("Edwards") were giving Janerpoy and Paulina Cueva ("Cueva") dirty looks and whispering and laughing when they passed Janerpoy and Cueva, and Edwards was acting nasty towards Cueva and there was tension amongst them.

5. During the August 1, 2019 meeting, Castillo said she had no problems with anyone and that Janerpoy did not like her.

6. Everyone agreed to be respectful to one another and the meeting ended.

7. Contrary to Castillo's statement in paragraph 15 of Castillo's affidavit, at no time during the August 1, 2019 meeting did Castillo complain about Luis Simeoli sexually harassing her nor was he discussed during that meeting.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 16, 2021


Cathy DeGeorgio 2/16/21